

**MELODY A. KRAMER**, SBN 169984  
KRAMER LAW OFFICE  
9930 Mesa Rim Road, Suite 1600  
San Diego, California 92121  
Telephone (858) 362-3150

**J. MICHAEL KALER**, SBN 158296  
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9930 Mesa Rim Road, Suite 200  
San Diego, California 92121  
Telephone (858) 362-3151

Attorneys for Plaintiff JENS ERIK SORENSEN,  
as Trustee of SORENSEN RESEARCH AND  
DEVELOPMENT TRUST

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA

JENS ERIK SORENSEN, as Trustee of	)	Case No. CV 07 55 25 JSW (BZ)
SORENSEN RESEARCH AND	)	
DEVELOPMENT TRUST,	)	
	)	<b>DECLARATION OF MELODY A.</b>
Plaintiff	)	<b>KRAMER DETAILING STEPS</b>
v.	)	<b>TAKEN TO PROVIDE DEFENDANT</b>
	)	<b>WITH NOTICE OF THIS HEARING</b>
FIRST INTERNATIONAL DIGITAL,	)	
INC. an Illinois corporation; and DOES 1-	)	Date: March 5, 2008
100,	)	Time: 10:00 a.m.
	)	Courtroom G – 15 <sup>th</sup> Floor
Defendants.	)	Judge: Bernard Zimmerman
	)	
	)	
	)	
	)	

//

1 I, MELODY A. KRAMER, declare:

2 1. I am not a party to the present action. I am over the age of eighteen. I  
3 have personal knowledge of the facts contained within the following paragraphs, and  
4 could and would competently testify thereto if called as a witness in a court of law.

5 2. At all times relevant herein I have been an attorney for Sorensen  
6 Research and Development Trust ("SRDT"), Plaintiff in the above-captioned matter.

7 3. The following details the steps I have taken on behalf of my client to  
8 provide the defaulting Defendant, First International Digital, Inc. ("FID"), of these  
9 default proceedings. Based upon the following information, it is my belief that that  
10 FID and its representatives actually received notice of this suit, did not intend to file  
11 any responsive pleading, understood that this matter would proceed to default, and is  
12 aware that these default proceedings are occurring.

13 4. Prior to filing this case, I located publicly available records from the  
14 Illinois Secretary of State's office identifying Defendant First International Digital,  
15 Inc.'s Registered Agent for Service address as Shay-Ping T Wang, 1701 Edgewood  
16 Ln., Long Grove, IL 60047. A true and correct copy of the printout from the official  
17 website is attached hereto as Exhibit A.

18 5. Prior to filing of this case, I became aware that FID, on or about April  
19 19, 2007, had executed an Assignment for Benefit of Creditors with Assignee being  
20 David Abrams of Chicago, Illinois. Plaintiff filed a formal claim against the FID  
21 assets and also requested permission to review FID's records.

22 6. On October 24, 2007 I received an email from Mr. Jacobson of Mr.  
23 Abrams' office stated that after speaking with the "principal of FID Inc." (who, upon  
24 information and belief, is Shay-Ping T. Wang), they were refusing to acknowledge  
25 Plaintiff as a creditor of FID. He furthermore stated that "If you have obtained a  
26 judgment against FID or do in the future . . . we will grant you access to the [FID]  
27 records."  
28

1           7. The Complaint in this matter was filed on October 30, 2007 and  
2 subsequently served on FID's registered agent for service of process, Shay-Ping T.  
3 Want, as reflected in the Amended Summons Returned Executed (Docket #16) in  
4 this case.

5           8. In addition to formal service of process, on November 1, 2007, I sent a  
6 letter with a copy of the Complaint to Mr. Abrams and Mr. Jacobson.

7           9. Subsequently, I received a phone call and follow-up letter dated  
8 November 30, 2007 from attorney Chester Foster, attorney for Mr. Abrams. That  
9 call and letter confirmed that FID did not intend to defend this lawsuit, and that if my  
10 client obtained a judgment against FID, they could file a claim against the FID estate  
11 for the amount of the judgment.

12           10. On January 18, 2008, I served the "Order Scheduling Hearing on  
13 Plaintiff's Motion for Default Judgment on the Defendant First International Digital,  
14 Inc." by U.S. Certified Mail to the following address: Shay-Ping T Wang, 1701  
15 Edgewood LN., Long Grove, IL 60047. A true and correct copy of the Proof of  
16 Service and Certified Mail Receipt is attached hereto as Exhibit B.

17           11. FID received service of the Order on January 22, 2008. A true and  
18 correct copy of the Domestic Return Receipt is attached hereto as Exhibit C.

19           12. On February 14, 2008, I caused my secretary, Evgenia Bjork, to deposit  
20 with the FedEx a copy of "Amended Order Scheduling Hearing on Plaintiff's Motion  
21 for Default Judgment" addressed to Mr. Foster. A true and correct copy of the Proof  
22 of Service is attached hereto as Exhibit D.

23           13. Mr. Foster received service of the above-named Order on February 15,  
24 2008. A true and correct copy of the FedEx Shipment Delivery Confirmation is  
25 attached hereto as Exhibit E.

26           14. A copy of this Declaration is being sent to Mr. Foster and Mr. Wang,  
27 though not specifically required by the Court.

28 //

1 DATED this 26<sup>th</sup> day of February, 2008.

2  
3 JENS ERIK SORENSEN, as Trustee of  
4 SORENSEN RESEARCH AND DEVELOPMENT  
5 TRUST, Plaintiff

6 /s/ Melody A. Kramer

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7 Melody A. Kramer, Esq.  
8 Attorney for Plaintiff  
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**PROOF OF SERVICE**

I, Melody A. Kramer declare: I am and was at the time of this service working within in the County of San Diego, California. I am over the age of 18 year and not a party to the within action. My business address is the Kramer Law Office, Inc., 9930 Mesa Rim Road, Suite 1600, San Diego, California, 92121. I am a member of the State Bar of California and the Bar of this Court.

On February 26, 2008, I served on the parties to this action the following documents:

**DECLARATION OF MELODY A. KRAMER DETAILING STEPS TAKEN  
TO PROVIDE DEFENDANT WITH NOTICE OF THIS HEARING**

PERSON(S) SERVED	PARTY(IES) SERVED	METHOD OF SERVICE
Chester H. Foster, Jr. Foster, Kallen & Smith 3825 W. 192 <sup>nd</sup> Street Homewood, IL 60430	Attorney for David Abrams, Assignee for First International Digital <i>(no appearance filed in this case)</i>	Federal Express
Shay-Ping T. Wang 1701 Edgewood Ln. Long Grove, IL 60047	Registered Agent of First International Digital, Inc. <i>(no appearance filed in this case)</i>	Federal Express

☐ (Personal Service) I caused to be personally served in a sealed envelope hand-delivered to the office of counsel during regular business hours.

☒ (Federal Express) I deposited or caused to be deposited today with Federal Express in a sealed envelope containing a true copy of the foregoing documents with fees fully prepaid addressed to the above noted addressee for overnight delivery.

I declare that the foregoing is true and correct, and that this declaration was executed on Tuesday, February 26, 2008, in San Diego, California.

/s/ Melody A. Kramer

\_\_\_\_\_  
Melody A. Kramer

## **EXHIBIT A**

[SERVICES](#)[PROGRAMS](#)[PRESS](#)[PUBLICATIONS](#)[DEPARTMENTS](#)[CONTACT](#)

## CORPORATION FILE DETAIL REPORT

Entity Name	FIRST INTERNATIONAL DIGITAL, INC.	File Number	60135916
Status	GOODSTANDING		
Entity Type	CORPORATION	Type of Corp	DOMESTIC BCA
Incorporation Date (Domestic)	09/21/1998	State	ILLINOIS
Agent Name	SHAY-PING T WANG	Agent Change Date	09/21/1998
Agent Street Address	1701 EDGEWOOD LN	President Name & Address	SHAY PING T WANG 135 WEST CENTRAL ROAD SCHAUMBURG 60195
Agent City	LONG GROVE	Secretary Name & Address	SHAY PING T WANG SAME
Agent Zip	60047	Duration Date	PERPETUAL
Annual Report Filing Date	09/21/2006	For Year	2006

[Return to the Search Screen](#)[Purchase Certificate of Good Standing](#)

(One Certificate per Transaction)

[BACK TO CYBERDRIVEILLINOIS.COM HOME PAGE](#)

## **EXHIBIT B**



1 **MELODY A. KRAMER**, SBN 169984  
2 **KRAMER LAW OFFICE**  
3 9930 Mesa Rim Road, Suite 1600  
4 San Diego, California 92121  
Telephone (858) 362-3150

5 **J. MICHAEL KALER**, SBN 158296  
6 **KALER LAW OFFICES**  
7 9930 Mesa Rim Road, Suite 200  
8 San Diego, California 92121  
Telephone (858) 362-3151

9 Attorneys for Plaintiff **JENS ERIK SORENSEN**,  
10 as Trustee of **SORENSEN RESEARCH AND**  
11 **DEVELOPMENT TRUST**

12  
13 **UNITED STATES DISTRICT COURT**  
14 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**

15 **JENS ERIK SORENSEN**, as Trustee of ) **Case No. CV 075525 JSW (BZ)**  
16 **SORENSEN RESEARCH AND** )  
17 **DEVELOPMENT TRUST,** )  
18 )  
19 **Plaintiff** ) **PROOF OF SERVICE**  
20 **v.** )  
21 )  
22 **FIRST INTERNATIONAL DIGITAL,** )  
23 **INC. an Illinois corporation; and DOES** )  
24 **1-100,** )  
25 **Defendants.** )

26 I, Melody A. Kramer, declare:

27 I am and was at the time of this service working within the County of San  
28 Diego, California. I am over the age of 18 years and not a party to the within action.

1 My business address is 9930 Mesa Rim Road, Suite 1600, San Diego, CA  
2 92121. I am a member of the State Bar of California.

3 On January 18, 2008 I served the following documents:

4 **Amended Proof of Service of Summons & Complaint**  
5 **Renewed Request for Entry of Default Judgment Against FID**  
6 **Affidavit of Melody Kramer in Support of Renewed Request for Entry of**  
7 **Default**

8 **[Proposed] Default Judgment against FID**

9 **Order Scheduling Hearing on Plaintiff's Motion for Default Judgment**

10 on the parties to this action as follows:

11 First International Digital, Inc.  
12 c/o Registered Agent for Service of Process  
13 Shay-Ping T Wang  
14 1701 Edgewood Lane  
Long Grove, IL 60047

15 By U.S. Mail – Certified Mail, Return Receipt Requested. I deposited or caused to be  
16 deposited with the U.S. Postal Service is a sealed envelope containing a true copy of  
17 the foregoing documents with postage fully prepaid addressed to the above-noted  
18 addressee. A copy of the Certified Mail Receipt and a delivery confirmation letter  
19 from the United States Post Office is attached hereto.

20 I declare that the foregoing is true and correct, and this declaration was executed on  
21 this 18 day of February, 2008, in San Diego, California.

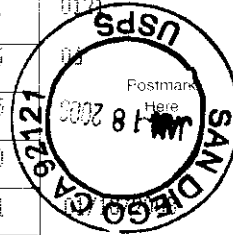
22 */s/ Melody A. Kramer*

23 \_\_\_\_\_  
24 Melody A. Kramer, Esq.  
25 Attorney for Plaintiff  
26  
27  
28

**U.S. Postal Service**  
**CERTIFIED MAIL RECEIPT**  
*(Domestic Mail Only; No Insurance Coverage Provided)*

LAKE ZURICH IL 60047

Postage	\$	\$1.31
Certified Fee		\$2.65
Return Receipt Fee (Endorsement Required)		\$2.15
Restricted Delivery Fee (Endorsement Required)		\$0.00
<b>Total Postage &amp; Fees</b>	<b>\$</b>	<b>\$6.11</b>



Sent To: **First International Digital**  
 c/o **Shay-Ping T Wang**  
 Street, Apt. No.,  
 or PO Box No. **1701 Edgewood Lane**  
 City, State, ZIP+4  
**Lone Grove, IL 60047**

PS Form 3800, January 2001

See Reverse for Instructions

7001 0320 0004 3020 1496

## **EXHIBIT C**

Is your RETURN ADDRESS completed on the reverse side?

**SENDER:**

- Complete items 1 and/or 2 for additional services.
- Complete items 3, 4a, and 4b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):

1. ☐ Addressee's Address
2. ☐ Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:

First International Digital, Inc.  
Shay-Ping T Wang  
1701 Edgewood Lane  
Long Grove, IL 60047

4a. Article Number

7001 0320 0004 3020 1496

4b. Service Type

- |   |   |
|---|---|
| <input type="checkbox"/> Registered                     | <input checked="" type="checkbox"/> Certified |
| <input type="checkbox"/> Express Mail                   | <input type="checkbox"/> Insured              |
| <input type="checkbox"/> Return Receipt for Merchandise | <input type="checkbox"/> COD                  |

7. Date of Delivery

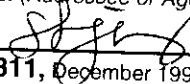
1-22-08

5. Received By: (Print Name)

S. Wang

6. Signature: (Addressee or Agent)

X



8. Addressee's Address (Only if requested and fee is paid)

PS Form 3811, December 1994

102595-98-B-0229

Domestic Return Receipt

Thank you for using Return Receipt Service.

## **EXHIBIT D**

1 **MELODY A. KRAMER**, SBN 169984  
2 **KRAMER LAW OFFICE**  
3 9930 Mesa Rim Road, Suite 1600  
4 San Diego, California 92121  
Telephone (858) 362-3150

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7 9930 Mesa Rim Road, Suite 200  
8 San Diego, California 92121  
Telephone (858) 362-3151

9 Attorneys for Plaintiff **JENS ERIK SORENSEN**,  
10 as Trustee of **SORENSEN RESEARCH AND**  
11 **DEVELOPMENT TRUST**

12  
13 **UNITED STATES DISTRICT COURT**  
14 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**

15	<b>JENS ERIK SORENSEN</b> , as Trustee of	)	Case No. CV 075525 JSW (BZ)
16	<b>SORENSEN RESEARCH AND</b>	)	
17	<b>DEVELOPMENT TRUST,</b>	)	
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18 Plaintiff ) **PROOF OF SERVICE**

19 v. )

20 **FIRST INTERNATIONAL DIGITAL,** )

21 **INC. an Illinois corporation; and DOES** )

22 **1-100,** )

23 **Defendants.** )

24  
25 I, Evgenia Bjork, declare:

26 I am and was at the time of this service working within the County of San  
27 Diego, California. I am over the age of 18 years and not a party to the within action.  
28

1 My business address is 9930 Mesa Rim Road, Suite 1600, San Diego, CA  
2 92121.

3 On February 14, 2008 I served the following documents:

4 **Renewed Request for Entry of Default Judgment Against FID**  
5 **Affidavit of Melody Kramer in Support of Renewed Request for Entry of**  
6 **Default**

7 **[Proposed] Default Judgment against FID**

8 **Amended Order Scheduling Hearing on Plaintiff's Motion for Default**  
9 **Judgment**

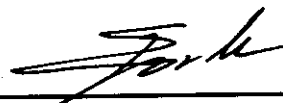
10 on the parties to this action as follows:

11 Chester H. Foster, Jr.  
12 Foster, Kallen & Smith  
13 3825 W. 192<sup>nd</sup> Street  
Homewood, IL 60430

14 By FedEx. I deposited with the FedEx a sealed envelope containing a true copy of  
15 the foregoing documents with postage fully prepaid addressed to the above-noted  
16 addressee.

17 I declare that the foregoing is true and correct, and this declaration was  
18 executed on this 14 day of February, 2008, in San Diego, California.

19 /s/



20  
21 Evgenia Bjork  
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## **EXHIBIT E**



**Ship** Track/History Address Book Preferences Fast Ship Reports My Profile

<< Log out Home

Quick help

Your Shipment Details:

<b>Ship to:</b>	Chester H. Foster Foster, Kallen & Smith 3825 W. 192nd Street Homewood, IL 60430 US 7087996300	<b>Package type:</b>	FedEx Envelope
		<b>Pickup/Drop Off:</b>	give to scheduled courier at my location
		<b>Weight:</b>	1 LBS
		<b>Dimensions:</b>	0 x 0 x 0 in
		<b>Declared value:</b>	0 USD
		<b>Shipper account number:</b>	195263736
<b>From:</b>	Melody A. Kramer Kramer Law Office 9930 Mesa Rim Road Suite 1600 San Diego, CA 92121 US 8588249090	<b>Bill transportation to:</b>	195263736
		<b>Courtesy rate quote:*</b>	18.04
		<b>Discounted variable %</b>	
		<b>Cod amount</b>	
		<b>Special services:</b>	
		<b>Shipment Purpose:</b>	
<b>Tracking no:</b>	799273114873	<b>Shipment type:</b>	Express
<b>Ship date:</b>	Feb 14 2008	<b>Commercial/Residential Status:</b>	Commercial
<b>Service type:</b>	Standard Overnight		

**Print**

**Return to History** **Track shipment**

#### Please note

\*The courtesy rate shown here may be different than the actual charges for your shipment. Differences may occur based on actual weight, dimensions, and other factors. Consult the applicable [FedEx Service Guide](#) or the FedEx Rate Sheets for details on how shipping charges are calculated.

FedEx will not be responsible for any claim in excess of \$100 per package, whether the result of loss, damage, delay, non-delivery, misdelivery, or misinformation, unless you declare a higher value, pay an additional charge, document your actual loss and file a timely claim. Limitations found in the current FedEx Service Guide apply. Your right to recover from FedEx for any loss, including intrinsic value of the package, loss of sales, income interest, profit, attorney's fees, costs, and other forms of damage whether direct, incidental, consequential, or special is limited to the greater of \$100 or the authorized declared value. Recovery cannot exceed actual documented loss. Maximum for items of extraordinary value is \$500, e.g., jewelry, precious metals, negotiable instruments and other items listed in our Service Guide. Written claims must be filed within strict time limits; Consult the applicable FedEx Service Guide for details.

[Close Window](#)Track Shipments/FedEx Kinko's Orders  
Detailed Results [Print](#)

<b>Tracking number</b>	799273114873	<b>Destination</b>	Homewood, IL
<b>Signed for by</b>	Signature release on file	<b>Delivered to</b>	Residence
<b>Ship date</b>	Feb 14, 2008	<b>Service type</b>	Standard Envelope
<b>Delivery date</b>	Feb 15, 2008 2:34 PM	<b>Weight</b>	0.5 lbs.
<b>Status</b>	Delivered		
<b>Signature image available</b>	<a href="#">No</a>		

Date/Time	Activity	Location	Details
<b>Feb 15, 2008</b>	2:34 PM <b>Delivered</b>	Homewood, IL	Left at side door Package delivered to recipient address - release authorized
	8:08 AM On FedEx vehicle for delivery	SOUTH HOLLAND, IL	
	7:25 AM At local FedEx facility	SOUTH HOLLAND, IL	
	4:30 AM At dest sort facility	CHICAGO, IL	
	4:45 AM Departed FedEx location	INDIANAPOLIS, IN	
	2:07 AM Arrived at FedEx location	INDIANAPOLIS, IN	
<b>Feb 14, 2008</b>	7:10 PM Left origin	SAN DIEGO, CA	
	5:00 PM Package data transmitted to FedEx		
	3:53 PM Picked up	SAN DIEGO, CA	

[E-mail results](#)   [Track more shipments/orders](#)

## Subscribe to tracking updates (optional)

Your name: Your e-mail address: 

E-mail address	Language	Exception updates	Delivery updates
<input type="text"/>	English	<input type="checkbox"/>	<input type="checkbox"/>
<input type="text"/>	English	<input type="checkbox"/>	<input type="checkbox"/>
<input type="text"/>	English	<input type="checkbox"/>	<input type="checkbox"/>
<input type="text"/>	English	<input type="checkbox"/>	<input type="checkbox"/>

Select format: ☒ HTML ☐ Text ☐ Wireless